

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:18 CR 618 JAR JMB
	)	
ANDRE KING,	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Paul D'Agrosa, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with two counts each of carjacking in violation of Title 18, United States Code, Section 2119 and 2 and brandishing a firearm in furtherance of a crime of violence in violation of Title 18, United States Code, Section 924(c)(1) and 2.
2. Pursuant to Title 18, United States Code, Section 3142(g),
  - (a) the weight of the evidence against defendant;
  - (b) the defendant's history and characteristics;
  - (c) and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release,warrant defendant's detention pending trial.

3. There is a serious risk that the defendant will flee.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

/s/ Paul J. D'Agrosa  
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